

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ABBOTT LABORATORIES,

Plaintiff,

v.

JEROME CLAVEL,

Defendant.

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) **Case No. 20-cv-06466**

) **Hon. Virginia M. Kendall**
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MOTION FOR AGREED PROTECTIVE ORDER

Plaintiff, by its attorneys, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 26(c) to enter the attached Agreed Protective Order respecting all materials produced or adduced in the course of discovery, including initial disclosures, responses to discovery requests, deposition testimony and exhibits, and information derived directly therefrom.

Dated: November 6, 2020

Respectfully submitted,

/s/ Rebecca Fitzpatrick
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 6, 2020 a true and accurate copy of the forgoing document was electronically filed with the CM/ECF system of the United States District Court for the Northern District of Illinois and served upon all counsel of record.

/s/ Rebecca Fitzpatrick

Rebecca Fitzpatrick